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May 4, 2020

BY ECF

The Hon. Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Andre Wilburn*, No. 19 Cr. 108 (MKB)

Your Honor:

This office represents Andre Wilburn. Pursuant to the Court's order of April 29, 2020, the parties propose the following pretrial motion calendar:

Defense motion to suppress due June 3, 2020;

Government response due July 3, 2020;

Defense reply due July 17, 2020.

The defense asks that this calendar be set without prejudice to a defense motion to adjourn the calendar should the emergency MDC protocols continue to prevent counsel from reviewing the discovery at length with Mr. Wilburn.

Respectfully submitted,

/s James Darrow

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Attorneys for Andre Wilburn

cc: Counsel of record (by ECF)